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May 28, 2008

**BY FAX**

The Honorable Loretta A. Preska  
United States District Judge  
500 Pearl Street, Rm. 1320  
New York, New York 10007

Re: Abu Camara v. City of New York, et al.  
CV 07 5874 (LAP)(FM)

Your Honor:

I represent the plaintiff in the above-referenced civil rights action. I write with the consent of defendants' counsel, Ms. Robyn N. Pullio, to respectfully request a sixty day enlargement of time to complete fact discovery from May 31, 2008 to August 1, 2008, and a corresponding enlargement of time to submit the joint pre-trial order from June 30, 2008 to August 29, 2008. This is the parties' second request for an extension of time to complete discovery. The first request was granted on March 31, 2008.

There are several reasons for this request. First, after the Court granted the parties' first request to extend discovery on March 31, 2008, the defendants' attorney, A.C.C. Jordan M. Smith, resigned from the New York City Law Department, and the City's file was recently transferred to A.C.C. Pullio. While Ms. Pullio has been diligent in getting up to speed on her file, there are still outstanding documentary and deposition discovery matters that have not been completed. This has been complicated by the fact that the location of the incident - a homeless shelter operated by the defendants - has been closed for over a year, and therefore requests for records are more complicated than usual. In addition to facilitating the completion of outstanding discovery, the requested time will allow the parties to continue their good faith efforts to resolve the action.

Thank you for your consideration.

*The extension is granted.*

ORDERED  
*Loretta A. Preska*  
LORETTA A. PRESKA  
UNITED STATES DISTRICT JUDGE

*June 3, 2008*

Respectfully submitted,

*Brett H. Klein*  
Brett H. Klein